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EPA Region 5 Records Ctr.



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Ron Selph
Mayor

January 11, 1995

RECEIVED

JAN 16 1995

OFFICE OF
PUBLIC AFFAIRS

Ms. Susan Pastor
Community Relations Coordinator
Office of Public Affairs (P-19-J)
U.S. EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

RE: Public Comments - NL Industries/Taracorp
Superfund Site

Dear Ms. Pastor:

On behalf of the City of Granite City, enclosed please find the comments of the City of Granite City, as well as the separate comments of Alderman Craig Tarpoff. Also for filing are the following studies/reports and articles:

1. Response to Comments of U.S. EPA Reviewers Regarding the Granite City Lead Study Draft Report, by Dr. Maurice LeVois, dated July 21, 1994;
2. Review and Comment of the Preliminary Assessment of Data from the Madison County Lead Study and Implication for Remediation of Lead Contaminated Soil, by Dr. Renate D. Kimbrough;
3. Management of Children with Slightly Elevated Blood Levels, by Dr. Renate D. Kimbrough, et al;
4. Survey of Lead Exposure Around a Closed Lead Smelter, by Dr. Renate D. Kimbrough, et al;
5. Report on Traffic Related Issues, prepared by Crawford, Bunte, Brammeier;

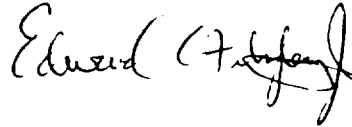
- need stmt of soil contribution to dust
@ NL, esp. nearer the smelter

Recurring
themes for
Pat:

- G.C. is "typical"
- can do intervention forever - "grass police"
- study w/o control - value of
- effect of not considering paint in IUBX
- look @ Bothe, MT
→ Alan ran model
here to get 1200 ppm, which was used

6. Summary Report - Evaluation of USACOE Remedial Action Program, Granite City, Illinois, by Jonathan Spencer, P.E., DEE Vice President-Engineering Services, Earth Sciences Consultants, Inc.;
7. Economic Impact Assessment of the Proposed Clean-up in Granite City, by Dr. Geoffrey Hewings, PhD., Professor in the Departments of Geography and Urban and Regional Planning at the University of Illinois; Director of the Regional Economics Applications Laboratory.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward (F. H. H. H.)".

ECF/jlg
Enclosure

15142

NL INDUSTRIES/TARACORP SITE

COMMENTS TO PROPOSED PLAN

Introduction

In March, 1990, the United States Environmental Protection Agency (U.S. EPA) issued a Record of Decision (ROD) for the NL Industries/Taracorp Superfund Site located in Granite City, Illinois. The U.S. EPA requires a soil clean-up level for lead of 500 parts per million (ppm) of approximately 1,300 properties in a 55 block area. The site includes a secondary smelter facility, which has not been in operation since 1983, and which is claimed to be the source of lead contamination in the soils in the area. The majority of the properties proposed to be cleaned are residential, and the remaining properties are commercial and industrial. Near the smelter facility on the site is a pile composed primarily of blast furnace slag and battery case material. The volume of the pile is approximately 85,000 cubic yards.

In October, 1994, the U.S. EPA issued a proposed plan whereby the agency indicated a consideration of the soil clean-up level for lead of 500 ppm, and indicated further that it had yet to make a decision concerning the pile. Public comments were invited.

The City of Granite City has remained steadfast in its resolve to assure that any remediation strategy employed by the U.S. EPA take into account the health and safety of its citizens, and the overall well being of the City. This was true in 1990 and is equally true in 1995. Through two mayoral administrations and

numerous changes in the City Council, the City's resolve has remained unchanged. The City has been active in the pending litigation, including requesting injunctive relief in August, 1994 to prevent the unanticipated and inappropriate residential soil clean-up. The City has retained qualified experts in numerous fields of study to guide it in its decisionmaking, and most recently sponsored an environmental sampling study of the seventeen residences that were subject to soil remediation during the fall of 1994.

Notwithstanding the plight and circumstances of the very citizens it purports to protect, the U.S. EPA is prepared to go forward with a clean-up of soils that will not result in any material benefit to the health of the citizens, cause hazardous conditions to prevail within the City, dramatically affect the social and economic well being of the City, and create an unnecessary stigma that will thwart the social and economic growth of the City.

Health Study

Based upon a review of the documents and information provided in the ROD, in particular the Madison County Lead Exposure Study, (Health Study), the U.S. EPA cannot justify the 500 ppm clean-up level being proposed. The Health Study substantiates there is no valid nexus between a clean-up at that level and a reduction in blood lead levels in children, which are considered to be the population sub-group that is most at risk with regard to soil lead

contamination. (Indeed, as demonstrated elsewhere, a clean-up at the 500 ppm level as proposed by the U.S. EPA will prove to be injurious to the health and safety of those very citizens intended to be protected.)

Pat-
say it {
Pat-
say it {
In fact, and as proven by the Health Study, the level of blood lead in children in Granite City is no different than any similar group in urban areas. The mean blood lead level of the 490 children younger than six years in the Health Study was below the Center for Disease Control's (CDC) level of concern. Even for the children who had elevated blood lead levels (78), the majority of their blood lead levels was less than 25 mg/dL, which was the CDC level of concern until 1991.

Can
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agree
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Most of the houses in the community that were subject to the Health Study were built before 1920 and had high lead paint levels, both in the interior and exterior of these homes. High levels of lead were also found in many house dust and soil samples. These factors should have been evaluated by the U.S. EPA to determine the proportional contribution of lead from all sources. Had they been considered, the only conclusion that could be reached was that lead paint was a major contributing factor whereas soil lead was relatively insignificant. In this regard, the Health Study validates the impropriety of remediating soils at the 500 ppm level.

The U.S. EPA has attempted to rebuke the Health Study in its "Comments on Madison County Lead Exposure Study, Granite City,

Illinois" by A. H. Marcus, et al and its "Preliminary Assessment of Data from the Madison County Lead Study and Implications for Remediation of Lead-Contaminated Soil" by A. H. Marcus. However, neither analysis has any merit as proven by the memorandum from Dr. Maurice LeVois to Dr. Tom Long dated July 21, 1994, "Response to Comments of U.S. EPA Reviewers Regarding the Granite City Lead Study Draft Report" and the comments from Dr. Renate D. Kimbrough, reviewing and commenting on Dr. Marcus' preliminary assessment study. It is apparent that the U.S. EPA reviewers do not understand the application of the hierarchical regression model and, accordingly, any of the U.S. EPA's comments regarding same should be ignored. Additionally, the U.S. EPA reviewers failed to comprehend the nature and significance of the data and its relation to the study conclusions. For example, while children living closer to the smelter had higher blood lead levels, these children lived in houses that were poorly maintained and which contained higher concentrations of lead in paint, as compared to children living further away from the smelter. It was not the distance to the smelter that presented a strong correlative factor with regard to blood lead levels, but rather the quality of the housing stock and the high lead levels in interior and exterior paint that influenced the blood lead levels. The Health Study which is already part of the record, is also described and its results explained in two separate articles in "Pediatrics", Management of Children with Slightly Elevated Blood Lead Levels, and "Survey of

Alan
+ Pat
read +
built
into Alan's
final report

Sams
as
PRA

Lead Exposure Around a Closed Lead Smelter", both authored by Drs. Kimbrough and LeVois and David Webb, M.S.

The U.S. EPA's reliance on the IEUBK model to justify the 500 ppm level of clean-up is inappropriate and gross in its application in this instance. The U.S. EPA has chosen to rely upon a faulty model, as described in the comments by Dr. Gary L. Ginsberg, et al "The Granite City Lead Exposure Dataset: IEUBK Modeling and Evaluation of Soil Lead as a Risk Factor", filed as part of this record. First, the U.S. EPA has chosen to ignore site specific data, which is provided in the Health Study, in deference to the model. Second, the model does not take into account or consider lead in paint, which is a major contributor of lead in house dust. Logic dictates a conclusion that a model which does not take into account a major contributing lead source, is intuitively deficient.

Rather than duplicate comments to be part of the ROD, the City of Granite City joins in the comments made by the PRPs relating to the impropriety of the selection of the 500 ppm level and use of the IEUBK model.

Waste Pile

The remediation strategy now being considered by the U.S. EPA is additionally deficient as there is no proposal with regard to the pile. Information obtained from U.S. EPA representatives indicates that a decision on the pile was not made a part of the amended ROD because of the lack of valid information from contractors as to the cost of either capping or removing the pile.

Setting aside that reason as a valid justification for not making a decision with regard to the pile, it would be improper and illegal to consider any remediation strategy until such time as a decision is made with regard to the pile, by the U.S. EPA.

me { The pile is vast in terms of its dimensions, as well as the concentration of lead where in many parts it is as much as 300,000 ppm lead. The record already demonstrates the amount and density of lead in the pile that is to be capped or removed. Whether the final remediation strategy is to cap or remove the pile, either effort will result in the use of heavy equipment, including trucks and excavation machinery, over an extended period of time, which will cause significant health risks to the population and be injurious to the City's social and economic well being. The heavy machinery, trucks and excavation equipment will cause airborne dust emissions containing lead to infiltrate the air in the surrounding community. Further, as the heavy machinery, trucks and excavation equipment transport materials and soil and move about the streets and avenues of the City, additional contaminated soils will transverse throughout the City. The U.S. EPA has yet to substantiate how it will be able to proceed with either capping or removal of the pile in a way that will not result in a contamination of surrounding properties and/or a recontamination of properties already cleaned.

Impact to City

me { The U.S. EPA's failure to make a decision concerning the pile will prove to be damaging to the City's social and economic well

being, as will the decision to rely upon the 500 ppm standard. Essentially, the U.S. EPA proposes to remediate hundreds of properties, which will literally take years, and then at some point in time decide what to do with the pile. Thereafter, whatever action is contemplated for the pile, there is a likelihood those actions will result in a contamination or recontamination of properties that surround the smelter facility. This action may result in a remediation of these properties once more. This kind of bureaucratic redundancy will affect the City's ability to survive economically. A municipality faces a difficult task of dealing with the social and economic stigma that results from any U.S. EPA clean-up, let alone having to face the same consequences twice. Yet, this is the course the U.S. EPA has chosen for Granite City.

me-
mention
pub.
com
period
2/17

- Pat
help
me w/
recontam.
- other
sites w/
large scale
remed.
Gran?

Dr. Geoffrey Hewings asserts the U.S. EPA's remedy may reduce property values in the City of Granite City. Of course, this decrease will effect the residents directly, as many now are unable to move from the area without suffering a great financial loss on the sale of their homes. These decreased property values will likely continue during the time the U.S. EPA expects to complete the remedy which, based on the time used thus far, will take at least ten years.

The magnitude of the proposed remedy will also effect business and other commercial interests in the downtown area, as increased traffic, congestion, and delays will result. Rather than deal with

can chg. routes, what about X,000 trucks/day
from Steel Mill

they shut
us down
PRR failure
to
implement
- ~~prop~~
Hawkins
why prop
vals ↓?

these inconveniences, customers and other visitors will likely do business elsewhere, resulting in an adverse effect on the businesses and commercial interests in the downtown area.

The impact on decreased property values and less business will have a proprietary impact on the City of Granite City in the form of decreasing tax revenues. As property values and the number of valuable businesses decrease, tax revenues will also decrease. This chain reaction will result in less revenues to provide for municipal services to the citizens of the City.

Jonathan Spencer, Vice President of Engineering Services for Earth Sciences Consultants, Inc., in his summary report, concludes that there are a "number of serious concerns regarding the ability of the program to control lead exposure in the community and to do so in a cost effective manner". Based on his review of the activities to date, it is reasonable to expect a contamination of clean areas outside the active work zone and a recontamination of areas previously clean. Mr. Spencer, consistent with the observations of Drs. Kimbrough and LeVois, notes that the problem of lead base paint on the interior and exterior of the homes is not being addressed by the U.S. EPA. Thus, removing soils will have no consequential impact on the blood lead levels of the children, in particular, and the residents in the homes because the major lead source continues to remain.

me { Finally, Mr. David Brammeier prepared a study on traffic related issues, and he identified specific problems within certain

one { areas of the 55 block clean-up area. In particular, Mr. Brammeier expressed concern over the clean-up in and around St. Elizabeth's Hospital in Granite City, which is the City's second largest employer. The clean-up in this area is exacerbated by the numerous one way streets and narrow streets that surround the hospital. Furthermore, he anticipates that the activities in question will require the displacement of much on street parking. This results in not only in inconvenience to the citizens, but creates a potential for vehicular and pedestrian accidents.

Tim
+ comment
on video { To date, based on the limited activity engaged by the U.S. EPA, there is already strong evidence that traffic congestion will create havoc. A number of streets and alleys have been blocked, or partially blocked, for weeks and months at a time. Furthermore, the use of such trucks, and machinery and excavation equipment, hinders the visibility of drivers and pedestrians, which may amplify the opportunity for serious or even fatal accidents.

+
Citizen
Comments
have { Again, to date, the City is very much aware of the not just the potential for damage to its infrastructure, but knows it to be an actuality. Already the limited remediation activities by the U.S. EPA have resulted in damage to a number of sidewalks on City property, as well as damage to sidewalks, concrete fixtures, fencing, and shrubbery of those residences being cleaned. Magnifying this activity over 1,300 properties results in significant damage to the infrastructure, which cannot be condoned under the premise of the remediation strategy now being considered

by the U.S. EPA.

In summary, the City of Granite City opposes the remediation plan being considered by the U.S. EPA, in particular the use of the 500 ppm standard for soil lead removal and the failure to address the pile.

Respectfully submitted,



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Attorney for the City of
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